

Plan

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N674123431

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| FACILITY: Bodycote | | SRN / ID: N6741 |
| LOCATION: 3270 John F Donnelly Dr, HOLLAND | | DISTRICT: Grand Rapids |
| CITY: HOLLAND | | COUNTY: OTTAWA |
| CONTACT: Bill Flower, Senior General Manager | | ACTIVITY DATE: 10/10/2013 |
| STAFF: April Lazzaro | COMPLIANCE STATUS: Compliance | SOURCE CLASS: Minor |
| SUBJECT: Unannounced, scheduled inspection. | | |
| RESOLVED COMPLAINTS: | | |

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Bill Flower, Senior General Manager. Staff presented him the DEQ Environmental Inspections: Rights and Responsibilities Brochure and its contents were discussed.

Mr. Flower indicated that nothing had changed equipment wise at the facility since the last AQD inspection, which was in 1999. He did not feel that there was any compliance issues regarding the quench oil usage limits contained in the permit.

The facility maintains 10 nitrogen atmosphere vacuum furnaces in a clean room area. There are parts washers that are heated and utilize an alkaline soap.

Permit to Install No. 236-99 covers two steel heat treat units that are still referred to as # 7 and # 8. It limits usage of quench oil to 91 gallons per month for the two units combined. There is no 12-month rolling total requirement. They heat treat mainly steel automotive parts. Each heat treat unit consists of a heat treat chamber, oil quench tank, flame curtains and a washer. Mr. Flower indicated that the oil mist (particulate emissions seen being emitted from stack) is generated by residual oils in the wash that happens after the oil quench. The oil temperature in the quench tank is ~130 F. Following the quench process, the parts will go into one of four tempering furnaces.

Mr. Flower indicated he was aware of the issues surrounding a recent inspection by AQD staff at the Grand Rapids Bodycote plant. Staff asked him if any of those issues would apply to the Holland plant and he indicated that they would not.

Following the physical inspection, Mr. Flowers got Ahmad Hammoud on the phone who handles environmental issues for the area Bodycote plants. Staff explained to him the status, and that a recordkeeping request was being made to Bodycote to demonstrate compliance with PTI No. 236-99.

The permit file contains an example of the expected usage demonstration which includes tracking oil added, oil disposed, oil reclaimed and oil used for clean-up. The facility is using this method of recordkeeping however, there are months where a lot of oil is disposed of or added and there are months where very little is added or disposed of. The company consultant has chosen to utilize a 12-month average to demonstrate compliance which indicates that average usage is 63 gallons per month. While staff would prefer in the future to see a 12-month rolling average, neither is required by the permit. If looked at simply on a per month basis, there would be months indicating non-compliance but this is not realistic. Therefore, either method will be acceptable at this time.

Staff reminded Mr. Flowers verbally that the AQD has an expectation that the records are maintained and should be readily available.

The facility was in compliance at the time of the inspection.

NAME 

DATE 10-17-13

SUPERVISOR 